

EXHIBIT D

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November 12, 2019

VIA EMAIL

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Duane Morris LLP
30 South 17th Street
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**RE: *In re Valsartan Products Liability Litigation*, No. 1:19-md-02875
Plaintiffs' Preliminary Custodian List**

Dear Counsel:

Pursuant to the Court's November 7, 2019 order, Plaintiffs have enclosed their preliminary custodian list for ZHP and its subsidiaries. Nevertheless, Plaintiffs reserve their right to add additional custodians based on further information, including, but not limited to, ZHP's translated organization charts, the continuation of the meet and confer process, and further discovery from ZHP and other defendants. Subject to the court's decisions on the "macro" discovery issues, Plaintiffs maintain that they are entitled to discovery of the finished dose manufacturing practices and the finished dose manufacturing facilities' compliance with cGMPs.

As you will see, Plaintiffs have provided the first and last name of each custodian. Please confirm that this information is correct. Because of the different order that the parties may list their names, Plaintiffs may have the first and last names switched. Additionally, please inform Plaintiffs of any custodian's "Chinese" name, if not in the list, or "Western" name, if they have adopted one and it is not listed. Plaintiffs also request the confirmation of the custodian's title, department, and employer, which should include ZHP or any of its subsidiaries that have employed the custodian at any time. If the custodian has been previously accepted, Plaintiffs have noted the proffering party and date of proposal. To the extent feasible, Plaintiffs have included a short explanation of new additions to this list. However, the explanation is simply intended to assist ZHP or its

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subsidiaries in identifying the custodian. If the custodian is rejected, Plaintiffs reserve their right to more robustly explain their need for the custodian.

Very truly yours,



ADAM M. SLATER

Cc: Jessica Priselac, Esq.

Plaintiffs' Preliminary List of Custodians for ZHP and Its Subsidiaries as of 11/12/2019						
First name	Last name	Title	Department	Co.	Proffered by	Explanation if a new proposal
Senior Management						
Jun	Du	Vice President of ZHP, CEO of Huahai US, Princeton, Solco, and PrinJohnson		See Title Cell	P - 10.8.19	PrinJohnson's Facebook Identifies Du as its CEO
Baohua	Chen	Chairman and General Manager		ZHP and PrinJohnson	New	His senior role in the investigation of the Valsartan contamination. PrinJohnson's Facebook identifies him as its CEO.
Analytical						
Xie	Chaojun		Analyst	ZHP	P - 10.8.19	
Min	Li	VP	Analytical Operations	ZHP	D - 9.23.19	
Minfa	Wang	VP	Analytical Operations	ZHP/Princeton	P - 10.8.19	
Qing	Wang			ZHP	P - 10.8.19	
Dachuan	Zhao	VP	Analytical, Shanghai R&D Center	ZHP	New	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Xin	Geng	Post Doctoral Fellow and Research Scientist		Huahai US	New	Linkedin
Jack	Guan	Senior Director Analytical Operations		Princeton	New	Linkedin
Quality						
Wei	Cheng	VP	API Quality Assurance	ZHP	P - 10.8.19	
Remonda	Gergis	VP	Quality Assurance	Princeton	P - 10.8.19	
Zheng	Youqing	Deputy Manager	Quality Assurance	ZHP	P - 10.8.19	
Jucai	Ge	Director	Quality Assurance (API Division)	ZHP	D - 9.23.19	
Yuelin	Hu	Assistant Director	Quality Assurance (API Division)	ZHP	D - 10.7.19	
Ziqiang	Gu	Independent Consultant		ZHP and Princeton	P - 10.8.19	
Xiaohong	Zhao	Director	Quality Assurance (Chuannan Site)	ZHP	P - 10.8.19	

Hongliang	Wang		Quality	ZHP	New	Prepared Method Validation Report of Valsartan PRINSTON00031401
Zhen	Ye		Quality	ZHP	New	Reviewed part of Method Validation Report of Valsartan PRINSTON00031402
Baozhen	Chen	Director	Corporate Quality Assurance	ZHP	New	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Cunxiao	Ye	Vice President	Quality Assurance, Headquarters	ZHP	New	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Juan	Tao	Director Assistant	Quality Assurance	ZHP	New	Approve compliance with cGMP in Hydrochlorothiazide USP Organic Impurities Method Verification Report PRINSTON00041307
Caifeng	Zhao	Manager	Quality Assurance	ZHP	New	Prepared Deviation Investigation Report of Valsartan TEA Process V1, 2, & 3 PRINSTON0073443, 0075797, 0076100
Dongqin	Wang	Assistant Director	Quality Assurance at Chuannan Site East Zone	ZHP	New	Reviewed and signed off on Deviation Investigation Report of Valsartan TEA Process V1, 2, & 3 PRINSTON0073443, 0075797, 0076100; attended 5.19.17 meeting after the FDA inspection PRINSTON0074159
Zhizhang	Ding	Assistant Manager	Formulation Quality Assurance	ZHP	New	Reviewed and approved Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Y.F.	Chen	Senior Supervisor	API Quality Assurance	ZHP	New	Reviewed and approved Validation Report of LC-MS Method for NDBA in Losartan Potassium PRINSTON0074642; ; reviewed and approved the Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712
Xiong	Fei	Analyst	Quality Control	ZHP	P - 10.8.19	
Hu	Guangping	Director	Quality Control	ZHP	P - 10.8.19	
Huang	Rui	Director	Quality Control	ZHP	P - 10.8.19	
Minli	Zhang	Director	Finished Dose Quality Assurance and Quality Control	ZHP	D - 10.16.19	

Qiangming	Li	Director	Quality Control (API Division)	ZHP	D - 9.23.19	
Zie	Chaojun	Analyst	Quality Control	ZHP	P - 10.8.19	
Quang	Zhou	Analyst	Quality Research	ZHP	D - 10.23.19	
Ying	Xiong	Supervisor	Quality Research	ZHP	D - 10.23.19	
Fong E.	Zhuong	Associate Manager	Quality Research	ZHP	Discussed but not agreed to on 10.23.19	Org Chart
Dan Ping	Cai	Technical Assistant Director	Quality Research	ZHP	Discussed but not agreed to on 10.23.19	Org Chart
Yuanyan	Chen	Supervisor	Quality Research	ZHP	Discussed but not agreed to on 10.23.19	Org Chart
Yinhua	Tang	Assistant Director/Manager	Quality Control	ZHP	New	Reviewed and signed off on Deviation Investigation Reports of Valsartan TEA Process PRINSTON0073443, etc.; attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Fei	Shang	QP	Quality VP	ZHP	New	Reviewed and approved the third version of the Deviation Investigation into the TEA process PRINSTON0076100
Yun	Jin	Supervisor	Chuannan Quality Control	ZHP	New	Drafted Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948; draft Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405
Tian	Zhang	Analyst	Chuannan Q Control	ZHP	New	Reviewed and signed off on Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948; reviewed and signed off on Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405

Xianhua	Zhang	Deputy Director	Chuannan Quality Control	ZHP	New	Reviewed and signed off on Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948; reviewed and signed off on Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405
Xiaofen	Zhu	Analyst	Quality Control	ZHP	New	Author of Hydrochlorothiazide USP Organic Impurities Method Verification Report PRINSTON00041307
Hui	Dai	Analyst	Quality Control	ZHP	New	Data review of Hydrochlorothiazide USP Organic Impurities Method Verification Report PRINSTON00041307
Jing	Jing	Deputy Manager	Quality Control	ZHP	New	Managerial review of Hydrochlorothiazide USP Organic Impurities Method Verification Report PRINSTON00041307
J. Y.	Li	Analyst	Quality Control	ZHP	New	Drafted Method Validation Protocol of Residual Solvent (Acetonitrile) in TDCI Compound PRINSTON00077346; approved cGMP compliance of Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405
J.	Wang	Analyst	Quality Control	ZHP	New	Reviewed and signed off on Method Validation Protocol of Residual Solvent (Acetonitrile) in TDCI Compound PRINSTON00077346
Yingzhi	Chen	Analyst	Quality Control	ZHP	New	Author of Method validation for determining particle size distribution of hydrochlorothiazide PRINSTON00064277
Yuping	Chen	Deputy Manager	Formulation Quality Control	ZHP	New	Author of Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Xiaoling	Li	Manager	Formulation Quality Control	ZHP	New	Reviewed and signed off on Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384

Qiang	Zhuo	Analyst	API Quality Research	ZHP	New	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326
Tong	Wu	Analyst	API Quality Research	ZHP	New	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326
Tan	Xiao	Senior Supervisor	API Quality Research	ZHP	New	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326; reviewed and approved Validation report of the LC-MS method for NDMA in Losartan Potassium PRINSTON0074642; reviewed and approved the Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712
Wenbin	Chen	Analysis Director	API Quality Research	ZHP	New	Reviewed and signed off on Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326; ; reviewed and approved the Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712
Nan	Tong	Senior Supervisor	API Quality Research	ZHP	New	Approved the cGMP compliance for its intended use of Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326
Chongjun	Xie	Analyst	Quality Research	ZHP	New	Authored Hydrochlorothiazide Residual Solvent Method Validation Report PRINSTON00064288
Wenping	Hu	Team Leader	Quality Research	ZHP	New	Reviewed data in Hydrochlorothiazide Residual Solvent Method Validation Report PRINSTON00064288
Wenquan	Zhu	Director	API Quality Research	ZHP	D- 10.16.19	
X. G.	Liu	Quality Researcher	API Quality Research	ZHP	New	Drafted Validation report of the LC-MS method for NDMA in Losartan Potassium PRINSTON0074642

Y.Y.	He	Quality Researcher	API Quality Research	ZHP	New	Drafted Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712
Ye	Jenson		QP	ZHP	New	Approved the Deviation Investigation Reports of Valsartan TEA Process PRINSTON0073443, etc.
Yuding	Zhao	Director	Finished Dose RA	ZHP	D - 10.23.19	
Manufacturing						
Xiamong	Liu	Head	Technical for Finished Dose	ZHP	D - 10.16.19	
Congsheng	Jin	Valsartan Workshop Director		ZHP	New	Identified as the person “responsible for production of Valsartan”
Yongjun	Jin	Factor Assistant Director	Manufacturing	ZHP	New	Described as a “professional engineer,” and “has a wide experience at production technology management and is responsible for the technological development of all bulk drugs”
Dong	Peng	Director	Technical Department	ZHP	D - 9.23.19	
Peng	Wang	Senior Director	API Manufacturing	ZHP	D - 9.23.19	
Youhu	Wang	Technology Leader		ZHP	New	“Is responsible for Valsartan”
Jiangzhong	Yu	API and Intermediate Plant Manager	Manufacturing	ZHP	New	Responsible for all bulk drugs (including intermediates) at ZHP
Wenling	Zhang	Director Assistant	Technical, API Chuannan site West Zone (counterpart to Peng Dong)	ZHP	New	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Lijin	Jiang	VP	API Operation/Facility Director, API Chuannan Site	ZHP	New	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Zhengjun	Jia	Deputy Plant Director	Engineering and Maintenance, API Chuannan site East Zone	ZHP	New	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158

Junhui	Zuo	Deputy Plant Director	Engineering and Maintenance, API Chuannan site West Zone	ZHP	New	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Wei	Chen	Deputy Director	Production Department	ZHP	New	Reviewed and approved Deviation Investigation Reports regarding the TEA Process PRINSTON0073443, 0075797, 0076100
Lina	Wu	Senior Supervisor	Formulation Technology at ZHP	ZHP	New	Author of Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Xiaoming	Liu	Director	Formulation Technology at ZHP	ZHP	New	Reviewed and signed off on Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Jon M.	Bill, Jr.	VP & General Manager		Princeton Laboratories	New	“With 30 years of experience in pharmaceutical & high purity chemicals industry, Jon manages day-to-day activities at Princeton Laboratories, Princeton's Contract Manufacturing division.” • “Prior joining Princeton, he spent 12 years at Dynamic Engineering culminating as VP of Engineering & Technology. Prior to that Jon was with Bayer Corp. for 12 years at various sites and positions. Jon graduated from Purdue University & has a Master of Science in Chemical Engineering.” -Princeton Website

Eric Wen-Chien	Tsai, PhD	General Manager		Princeton and Prinbury BioPharm	New	Authorized signatory and sponsor or Quality Assurance Authentication of Valsartan. PRINSTON00029811. "Eric joined Prinbury BioPharm as General Manager in 2009, wholly owned subsidiary of Princeton, a Research and Development center located in Shanghai China. In this role he leads the R&D efforts has been making significant contribution to Princeton pipeline growth. Eric came to the company with strong technical expertise and management skills." -Princeton Website
Shuxi	Li	Technician	Formulation Technology at ZHP	ZHP	New	Drafted Master Packaging Batch Record PRINSTON00038702
Pijie	Xu	Assistant Director	Formulation Manufacture	ZHP	New	Reviewed Master Packaging Batch Record PRINSTON00038702
Weilding	Bian	Director	Forumulation Manufacture	ZHP	New	Reviewed Master Packaging Batch Record PRINSTON00038702
Pieter	Groenewoud	Executive Director	Technology	ZHP	New	Reviewed Master Packaging Record Approval PRINSTON00021688
Xiaojun	Gao	Technician	Technology	ZHP	New	Drafted Master Production Batch Record Approval PRINSTON00064070
Regulatory						
Linhong (Linda)	Lin	Director	Regulatory Affairs Department	ZHP	D - 9.23.19	
Wei Zhi	Chen	Translator		ZHP	New	Translated 08/26/2018 Ltr to the FDA
Yanfeng (Lucy)	Liu	Deputy Director / Manager	Regulatory Affairs	ZHP	D - 10.7.19	
Lije	Wang	VP	Head of Regulatory Affairs	Princeton	P - 10.8.19	
Ying	Xiong	Supervisor	Regulatory Affairs	ZHP	D 10.16.19	
Quo (Kathy)	Zhang	Senior Manager	Regulatory Affairs	Huahai US	P - 10.8.19	
Xiaodi	Guo	Vice President		Huahai US (linkedin), Princeton (website), and Solco (affidavits of service)	P for Princeton/Huahai US - 10.8.19 / New for Solco	He has accepted service as Solco's VP.

Wei (Helen)	Tong	Director	Regulatory Affairs	ZHP and Princeton?	New	Listed on ANDA Documents
Ting (Ada)	Zhou	Assistant Director	Regulatory Affairs	ZHP	D - 10.7.19	
Louis	Zhao		Regulatory Affairs	Princeton	New	Linkedin
Guangyu	Luo	Associate (2013-2015), Senior Associate (2015-2016), Specialist (2016-2017), Manager (2017-Present)		Princeton	New	Linkedin
Jenny	Lu	Senior Associate	Regulatory Affairs	Princeton	New	Linkedin
Procurement						
Min	Hu		Purchasing	ZHP	D -10.16.19	
Weiwei	Xu		Purchasing	ZHP	D - 10.16.19	
Min	Xu		Purchasing	ZHP	D -10.16.19	
Min	Xang		Procurement	ZHP	D - 10.16.19	
Zheng	Gaozhe		Purchasing	ZHP	D - 10.16.19	Was a person who was responsible for procuring solvents
API Sales						
Minda	Cai	Former VP	API Sales	ZHP	D - 10.16.19	
Jie	Wang	VP	Business Development	ZHP	D - 9.23.19	
Sheng	Zhong	Director	Business Development	ZHP	D - 10.16.19	
Zho	Cheng		Business Development	ZHP	New	Sells API to India
Wei	Chang	Translator	Business Development, API Sales	ZHP	D - 10.23.19	
Hongchao	Li	Manager	Business Development	ZHP	D - 10.16.19	
Xu	Mi		Business Development, API Sales	ZHP	D - 10.16.19	
Other Sales						
John	Iozzia	Director	Sales	Huahai US	D - 10.16.19	
Chris	Keith	Director	Sales	Solco/Princeton at some point as VP	D - 10.22.19 for Solco / New for Princeton	Solco's Website
Lesley	Zhu	SVP, Business Development & Portfolio	Sales	Princeton	P - 10.8.19	

Hai	Wang	VP, President, President		Huahai US (linkedin), Princeton (website), & Solco (website), respectively	P for Solco - 10.8.19	
Frank	Chen	Chief Investment Officer of Huahai US and CFO of PrinJohnson (according to PrinJohnson's Facebook)		Huahai US and PrinJohnson	New	Linkedin
Ping	Jiang	CFO (2015-2016)		PrinJohnson	New	Linkedin
Min	Hu	Manager of Business Development and Senior Director of Business Development		Huahai US (2007-2012) and Princeton (2012-Present), respectively	New	Linkedin
David	Ayres	Vice President	Sales	Solco	New	Solco's Website
Xin (Will)	He	Scientist (2012-2016), Manager (2019-Present)		Princeton	New	Linkedin
Peng	Shang	Senior Associate of Business Development/ Supply Chain		Princeton	New	Linkedin
Jane Qiu	X.	Senior Manager, Strategic Sourcing & Project Management		Princeton	New	Linkedin
Mark	Pierce	National Account Manager as of September 2019		Solco	New	Linkedin
Matthew	Arnold	National Account Manager from 2016-2019		Solco	New	Linkedin and Author of Only Solco-stamped document
Syncores						
Eric	Gu	Manager		Shanghai Syncores	P - 10.8.19	

James (Jun)	Wen	President		Shanghai Syncores	New	Linkedin
Frank	Zhao	VP		Shanghai Syncores	New	Linkedin
Alan Huasheng	Ding	Director	Business Development	Shanghai Syncores	New	Linkedin
Luping	Liu	Vice President		Shanghai Syncores	New	Linkedin
Prinbury BioPharm Ltd.						
Wenjian	Cai	General Manager		Prinbury	New	Prinbury website
Dachuan	Zhao	Executive Deputy General Manager		Prinbury	New	Prinbury website
Ping	Wen	Executive Director		Prinbury	New	Prinbury website
Yuanyuan	Xie	Director	Pharmaceutical Affairs	Prinbury	New	Prinbury website
Li	Tan	Director	Project Management	Prinbury	New	Prinbury website
Wei	Tian	Deputy General Manager of Analysis and Research		Prinbury	New	Prinbury website
Hongchun	Qiu	Deputy General Manager of Pharmaceutical Preparation Product Development		Prinbury	New	Prinbury website
Shine	Chen	Scientist		Prinbury	New	Prepared Method Verification Report for Valsartan PRINSTON00039715
Tina	Liu	Senior Scientist		Prinbury	New	Reviewed Method Verification Report for Valsartan PRINSTON00039715
Yun	Tian	Senior Director		Prinbury	New	Approved Method Verification Report for Valsartan PRINSTON00039715
Lily	Tan	QA Manager		Prinbury	New	Approved Method Verification Report for Valsartan PRINSTON00039715
Alex	Liu	Scientist		Prinbury	New	Prepared Dissolution Comparison Study Report of Valsartan PRINSTON00050114
Ashley	Lin	Associate Scientist		Prinbury	New	Prepared Method Robustness Study Report for Valsartan PRINSTON0039541
Luke	Wang			Prinbury	New	Reviewed and Approved Master Packaging Batch Record PRINSTON00038702

Jihui	Wang	Technician		Prinbury	New	Drafted Master Batch Packaging Record Approval PRINSTON00021688
Yula	Wang	Executive Director		Prinbury	New	Reviewed and approved Master Production Batch Record Approval PRINSTON00064070